

## **EXHIBIT J**



Emily Poler &lt;emily@polerlegal.com&gt;

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**Hay v. Bolonik, No. 23 Civ. 8584 (S.D.N.Y)**

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**Emily Poler** <emily@polerlegal.com>

Mon, Dec 11, 2023 at 9:26 AM

To: brucelawhay@proton.me

Dear Bruce - I represent Kera Bolonik in the above-captioned action.

I would urge you to withdraw your case against my client as the Complaint you filed is deficient for several reasons. By way of example, the claims you seek to state are barred by the doctrines of res judicata and the statute of frauds. Moreover, even if these doctrines did not preclude the claims you seek to assert, the claims are subject to dismissal because you have not (and cannot) allege a meeting of the minds. Without this, there is no contract.

If, notwithstanding the foregoing, you persist in advancing your meritless complaint against my client, I will accept service on her behalf. Please provide me with a prepared Notice of Lawsuit and Request to Waive Service form for me to return to you and comply with the procedures in that form.

Please note that if we are forced to make a motion to dismiss, we may seek sanctions against you. Such sanctions may include monetary sanctions, as well as an order barring you from filing litigation without leave of the court.

The foregoing is without prejudice to my client.

Regards,

Emily

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**POLER LEGAL****Emily A. Poler (she/her)**

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